

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY INC.  
et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official  
capacity as Secretary of State of Georgia,

Defendant.

CIVIL ACTION FILE  
NO. 1:21-CV-5337-SCJ

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COAKLEY PENDERGRASS et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official  
capacity as the Georgia Secretary of State,  
et al.,

Defendants.

CIVIL ACTION FILE  
NO. 1:21-CV-5339-SCJ

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ANNIE LOIS GRANT et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official  
capacity as the Georgia Secretary of State,  
et al.,

Defendants.

CIVIL ACTION FILE  
NO. 1:22-CV-122-SCJ

**JOINT MOTION FOR PROTECTIVE ORDER**

The parties in the above-captioned cases move for a protective order governing discovery in these actions.<sup>1</sup>

Discovery in these matters may include voter information and election administration related documents, some of which may be sensitive or include materials subject to confidentiality provisions of state law, such as those including a voter's full date of birth. *See, e.g.*, O.C.G.A. § 21-2-225(b). Accordingly, the parties respectfully request that the Court enter the proposed stipulated protective order filed contemporaneously herewith.

Respectfully submitted this 24th day of August, 2022.

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<sup>1</sup> In the interest of judicial economy, the parties move for a joint proposed stipulated protective order in each of the three above-captioned cases. The motion for a single protective order does not imply or reflect any intention to consolidate these cases under Federal Rule of Civil Procedure 42 or otherwise.

Dated: August 24, 2022

Respectfully submitted,

By: /s/ Rahul Garabadu

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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing RULE 5.4 CERTIFICATE OF SERVICE with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: August 24, 2022

/s/ Joyce Gist Lewis  
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